

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff)
)
v.)
)
SAYBROOK GRADUATE SCHOOL AND)
RESEARCH CENTER,)
Defendant)

PLAINTIFF SUSAN COONEY'S PROPOSED SPECIAL JURY VERDICT FORM

Plaintiff Susan Cooney hereby submits her following proposed special jury verdict form:

Q.1. Did Susan Cooney and Saybrook Graduate School and Research Center ("Saybrook") enter into a valid contract?

Yes _____ No _____

**If your answer is "Yes", please proceed to the next question.
If your answer is no, please skip to question 5.**

Q.2. Did Susan Cooney fulfill her obligations under the contract.

Yes _____ No _____

**If your answer is "Yes", please proceed to the next question.
If your answer is no, please skip to Question 5.**

Q.3. Did Saybrook breach the contract?

Yes _____ No _____

**If your answer is "Yes", please proceed to the next question.
If your answer is no, please skip to Question 5.**

Q.4. Did Saybrook's breach of the contract cause Susan Cooney any damages?

Yes _____ No _____

If your answer is "Yes", please proceed to the next question.

Q.5. Did Saybrook make a promise to Susan Cooney that it would assist those students who plan to seek licensure in the state of their choice and, to that end, would work together with the Consortium of Diversified Psychology Programs ("CDPP") to monitor and influence existing and changing regulations in order to assist Susan Cooney to be eligible for licensure?

Yes _____ No _____

If your answer is "Yes", please proceed to the next question.

If your answer is "No", and you answered "No" to any of questions 1, 2, 3, or 4, please STOP HERE. The jury foreperson must then sign and date the bottom of this form and return it to the person in authority.

If your answer is "No" but you answered "Yes" to questions 1, 2, 3 and 4, please skip to Question 8.

Q.6. Did Susan Cooney rely on this promise and was her reliance reasonable?

Yes _____ No _____

If your answer is "Yes", please proceed to the next question.

If your answer is "No", and you answered "No" to any of questions 1, 2, 3, or 4, please STOP HERE. The jury foreperson must then sign and date the bottom of this form and return it to the person in authority.

If your answer is "No" but you answered "Yes" to questions 1, 2, 3 and 4, please skip to Question 8.

Q.7. Did Susan Cooney's reliance on Saybrook's promise cause her any damages?

Yes _____ No _____

If your answer is "Yes", please proceed to the next question.

If your answer is "No", and you answered "No" to any of questions 1, 2, 3, or 4, please STOP HERE. The jury foreperson must then sign and date the bottom of this form and return it to the person in authority.

If your answer is “No” but you answered “Yes” to questions 1, 2, 3 and 4, please skip to Question 8.

Q.8. Please state the total amount of money you determine are Susan Cooney’s damages.

_____ Dollars
(amount in words)

(amount in numbers)

JURY FOREPERSON: Please sign and date below and return to person in authority.

I certify that all of the deliberating jurors concur in the answers to the above questions.

DATED:

Jury Foreperson signature

Jury Foreperson printed name

Respectfully submitted,
SUSAN COONEY,
By her attorneys,

/s/ E. Steven Coren
/s/ Paul W. Morenberg

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Dated: March 26, 2007

Certificate of Service

I hereby certify that this document file through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on today's date.

/s/ E. Steven Coren
/s/ Paul W. Morenberg

E. Steven Coren
Paul W. Morenberg